

EXHIBIT 68

CONFIDENTIAL



Transcript of **Andrea Sferes**

Tuesday, April 19, 2022

National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.

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Reference Number: 115542

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----
4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and
7 ANDREA SFERES,

8 Plaintiffs,

9 -and-

10 People of the STATE OF NEW YORK, by its Attorney
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE
12 STATE OF NEW YORK

13 -vs-

14 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
15 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
16 ROBERT MAHANIAN and JOHN and JANE DOES 1-10

17 Defendants.

18 -----
19 Deposition of ANDREA SFERES taken via Zoom on
20 Tuesday, April 19, 2022 at 10:00 a.m., before
21 Deirdre Smith, a stenographer and notary public
22 within and for the State of New York.

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24 CONFIDENTIAL
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1 A P P E A R A N C E S

2

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22 BY: NICOLE EPSTEIN, ESQ.

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18 BY: COLLEEN FERITY

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1 A. Can you repeat the question?

2 Q. Sure. So, what irrefutable harm did you
3 face at the time you filed the amended complaint on
4 November 22, 2020 --

5 MR. EPSTEIN: Objection.

6 Q. -- as you allege in paragraph 100?

7 A. I mean I'd say emotionally I felt very
8 stressed when I received the call and that, you
9 know, was uncomfortable for me.

10 Q. Did you feel like that on, after the
11 election on November 22, 2021?

12 A. The election in 2021? I'm sorry?

13 Q. So, when you filed -- the amended
14 complaint was filed on November 22, 2021.

15 A. Au-hau.

16 Q. Do you still feel the same?

17 A. I -- I feel some anxiety knowing that
18 this, these sort of falsehoods and such things are
19 going on.

20 Q. Previously today you testified that you
21 felt scared momentarily. So, is it fair to say that
22 you weren't still scared November 22, 2021?

23 MR. EPSTEIN: Objection.

24 A. I did not feel scared for my medical bills
25 being discovered.

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2 C E R T I F I C A T I O N

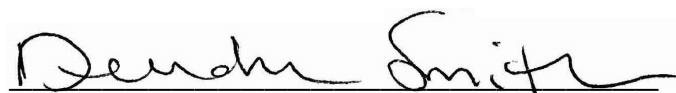
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5 THIS IS TO CERTIFY, THAT I, DEIRDRE M. SMITH,
6 on Tuesday, April 19th of 2022, reported the
7 proceedings contained in the foregoing 64 pages at
8 the time and place as set forth in the heading in
9 the foregoing matter. That the transcript is a true
10 and accurate transcription of my stenographic notes,
11 using Computer Aided Transcription, to the best of
12 my ability.

13 IN WITNESS WHEREOF, I have hereunto set my hand
14 this 29th day of April, 2022.

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Deirdre M. Smith

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